

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA)	
)	DOCKET NO. 3:21-CR-00022-RJC-DSC
v.)	
)	FACTUAL BASIS
JOSEPH RANSOME)	
_____)	

NOW COMES the United States of America, by and through R. Andrew Murray, United States Attorney for the Western District of North Carolina, and hereby files this Factual Basis in support of the plea agreement filed simultaneously in this matter.

This Factual Basis is filed pursuant to Local Criminal Rule 11.2 and does not attempt to set forth all of the facts known to the United States at this time. By their signatures below, the parties expressly agree that there is a factual basis for the guilty plea(s) that the defendant will tender pursuant to the plea agreement, and that the facts set forth in this Factual Basis are sufficient to establish all of the elements of the crime(s). The parties agree not to object to or otherwise contradict the facts set forth in this Factual Basis.

Upon acceptance of the plea, the United States will submit to the Probation Office a "Statement of Relevant Conduct" pursuant to Local Criminal Rule 32.4. The defendant may submit (but is not required to submit) a response to the Government's "Statement of Relevant Conduct" within seven days of its submission. The parties understand and agree that this Factual Basis does not necessarily represent all conduct relevant to sentencing. The parties agree that they have the right to object to facts set forth in the presentence report that are not contained in this Factual Basis. Either party may present to the Court additional relevant facts that do not contradict facts set forth in this Factual Basis.

1. The defendant, JOSEPH RANSOME was a resident of Indian Trail, North Carolina.

2. From in or about March 2020 and continuing until in or about July 2020, in the Western District of North Carolina, and elsewhere, and in relation to and involving a benefit authorized, transported, transmitted, transferred, disbursed, and paid in connection with, a presidentially declared major emergency (as those terms are defined in section 102 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5122), defendant JOSEPH RANSOME did voluntarily and intentionally (1) participate in a scheme and artifice to defraud with knowledge of its fraudulent nature and (2) obtain the money and property by means of false and fraudulent pretenses, representations, and promises (collectively, "the scheme to defraud").

3. It was part of the scheme to defraud that RANSOME applied for fraudulent UI benefits in the States of North Carolina, New Jersey, Connecticut, Florida, Minnesota, New York, Massachusetts, Maine, Washington, and Illinois, over the Internet.

4. It was further part of the scheme to defraud that RANSOME filed fraudulent claims for unemployment insurance (UI) benefits in his own name claiming non-existent employment and false reasons for termination, among other falsities.

a. For example, RANSOME falsely claimed to have been laid off from Walmart in North Carolina due to COVID, when in truth he was laid off for misconduct. RANSOME claimed prior employment at Target, BestBuy, Lowe's, and Hobby Lobby, among others, when he did not work for those companies. Further, RANSOME falsely claimed he was laid off from some of these companies because he had been diagnosed with COVID or due to lack of work because of COVID-19. On some occasions, RANSOME used a social security number and mailing address that did not belong to him.

5. It was further part of the scheme to defraud that RANSOME directed that payments of the fraudulent UI benefits be made to bank accounts or Green Dot cards under his control. For example:

a. On or about March 26, 2020, RANSOME submitted and caused to be submitted a fraudulent UI benefit claim to the State of North Carolina in his name falsely claiming that he had been laid off from Walmart in North Carolina because of a diagnosis of COVID-19. The fraudulent UI benefit claim directed that payments be made to a NASA Federal Credit Union (NASA FCU) account ending *3832.

b. On or about March 28, 2020, RANSOME submitted and caused to be submitted a fraudulent UI benefit claim to the State of New York in his name falsely claiming prior employment at Walmart in that state. The fraudulent UI benefit claim directed that payments be made to a NASA FCU account ending *3832 and a Wells Fargo Bank (Wells Fargo) account ending *6251.

c. On or about March 29, 2020, RANSOME submitted and caused to be submitted a fraudulent UI benefit claim to the State of Illinois in his name falsely claiming prior employment at Hobby Lobby in that state and that he had been laid off because of a diagnosis of COVID-19. The fraudulent UI benefit claim directed that payments be made to a NASA FCU account ending in *3832.

d. On or about April 4, 2020, RANSOME submitted and caused to be submitted a fraudulent UI benefit claim to the State of Massachusetts in his name falsely claiming prior employment at Walmart in that state. The fraudulent UI benefit claim directed that payments be made to a NASA FCU account ending in *3832.

e. On or about April 5, 2020, RANSOME submitted and caused to be submitted a fraudulent UI benefit claim to the State of New Jersey in his name falsely

claiming prior employment at Target in that state and that he had been laid off because of a diagnosis of COVID-19. The fraudulent UI benefit claim directed that payments be made to a NASA FCU account ending *3832 and a SunTrust account ending *2364.

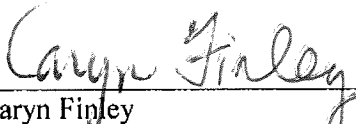
f. On or about April 7, 2020, RANSOM submitted and caused to be submitted a fraudulent UI benefit claim to the State of Minnesota in his name falsely claiming prior employment at Lowe's in that state. The fraudulent UI benefit claim directed that payments be made to a NASA FCU account ending *3832.

g. On or about April 30, 2020, RANSOME submitted and caused to be submitted a fraudulent UI benefit claim to the State of Washington in his name falsely claiming prior employment at Costco Wholesale Corporation in that state. The fraudulent UI benefit claim directed that payments be made to a NASA FCU account ending in *3832 and a Wells Fargo account ending *6251.

h. On or about May 10, 2020, RANSOME submitted and caused to be submitted a fraudulent UI benefit claim to the State of Connecticut in his name falsely claiming prior employment at Best Buy and that he had laid off because of a diagnosis of COVID-19. The fraudulent UI benefit claim directed that payments be made to a NASA FCU account ending in *3832 and a Wells Fargo account ending *6251.

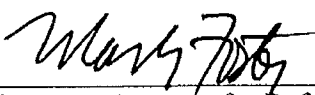
6. RANSOME acted willfully and with the intent to defraud.

R. ANDREW MURRAY
UNITED STATES ATTORNEY


Caryn Finley
ASSISTANT UNITED STATES ATTORNEY

Defendant's Counsel's Signature and Acknowledgment

I have read this Factual Basis, the Bill of Information, and the plea agreement in this case, and have discussed them with the defendant. Based on those discussions, I am satisfied that the defendant understands the Factual Basis, the Bill of Information, and the plea agreement. I hereby certify that the defendant does not dispute this Factual Basis.


Mark Foster, Attorney for Defendant

DATED: 1/25/21